

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>DAVITA KEY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No.:</b>
	)	<b>2:19-cv-00767-ECM</b>
<b>HYUNDAI MOTOR</b>	)	
<b>MANUFACTURING, ALABAMA,</b>	)	
<b>LLC; HYUNDAI ENG AMERICA,</b>	)	
<b>INC. and DYNAMIC SECURITY,</b>	)	
<b>INC.,</b>	)	
	)	
<b>Defendants.</b>	)	

**HYUNDAI ENG AMERICA, INC.’S TRIAL WITNESS LIST**

Defendant Hyundai Eng America, Inc. (“HEA”) submits the following list of witnesses it may call to testify at trial as permitted by the Federal Rules of Civil Procedure. HEA reserves the right to call any witness listed herein or in the witness designations of Plaintiff or the other defendants. HEA further reserves the right to amend or supplement this list as permitted by the Court.

**WITNESSES HEA EXPECTS TO CALL AT TRIAL:**

1. Davita Key, Plaintiff.
2. Cassandra Williams, c/o counsel for Defendant T. Matthew Miller, Bradley Arant Boult Cummings, LLP, 1819 5<sup>th</sup> Avenue North, Birmingham, AL 35203.

3. LaTunya Howell, former employee of Dynamic Security and current employee at HMMA.

**WITNESSES HEA MAY CALL AT TRIAL IF THE NEED ARISES:**

4. A records custodian to authenticate any subpoenaed documents if the parties cannot agree to their authenticity.

HEA reserves the right to call as a witness any person identified in the witness lists of Plaintiff or the other defendants and any witnesses needed for rebuttal.

Respectfully submitted this 26th day of January 2023.

*/s/ T. Matthew Miller*

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*Attorneys for Defendant  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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*/s/ T. Matthew Miller*  
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OF COUNSEL